

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

25-cv-938-ADM/DJF

Case No.:

Steve Salvador Ybarra, Pro Se

Plaintiff

v.

Honorable Judge David Lutz, in his official and individual capacity,

Michelle Ybarra,

Legal Assistance of Dakota County (LADC),

Lydia Clemens, Guardian ad Litem,

Defendants.

**RECEIVED**

MAR 14 2025

CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

---

COMPLAINT

**I. JURISDICTION & VENUE**

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1331 (Federal Question Jurisdiction), as this case arises under:

- The Fourteenth Amendment's Due Process and Equal Protection Clauses
- 42 U.S.C. § 1983 (Civil Rights Violation via State Action)

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d) (Prohibition Against Racial Discrimination in Federally Funded Programs)
  - 18 U.S.C. § 1343 (Wire Fraud)
2. Plaintiff seeks federal relief from ongoing due process violations, fraud, and judicial misconduct occurring in Dakota County Family Court.
  3. Venue is proper in this Court under 28 U.S.C. § 1391(b) because the events giving rise to this claim occurred in this District.

## **II. FACTUAL ALLEGATIONS**

1. Defendant Judge David Lutz has repeatedly refused to rule on urgent motions, allowing fraud and perjury to continue unchecked, violating Plaintiff's due process rights.
2. Defendant Michelle Ybarra engaged in financial fraud, perjury, and systemic abuse of legal aid programs by misrepresenting her income to obtain taxpayer-funded legal aid from LADC.
3. Defendant Legal Assistance of Dakota County (LADC) knowingly facilitated Michelle Ybarra's fraud, violating Title VI of the Civil Rights Act, by using public funds to provide unauthorized representation.
4. Defendant Lydia Clemens, Guardian ad Litem, submitted false reports omitting exculpatory evidence of Michelle Ybarra's abuse of the children and perjury.
5. Dakota County Family Court, under the oversight of Judge Lutz, has demonstrated clear bias against Plaintiff, violating Plaintiff's constitutional rights under the Fourteenth Amendment.
6. Judge Lutz failed to rule on critical motions, including but not limited to:
  - Motion to Request Removal from Case
  - Motion for Immediate Parenting Time
  - Motion to Disqualify Guardian ad Litem
  - Motion for Sanctions
  - Motion for Additional Sanctions
  - Motion to Compel Ruling
  - Motion to Force Ruling
  - Motion for Contempt
  - Refusal to rule on Subpeona on Dueces Tecum

- Motion to Disqualify Legal Assistance of Dakota County (LADC)
- Motion for Recusal
- Requests to Keep motions on March 11, 2025, Instead of April 21, 2025
- Cross Motion Submitted and Ignored

7. Despite overwhelming evidence of perjury, judicial misconduct, and collusion between Judge Lutz, Sharon Jones, and the Guardian ad Litem, the court continued proceedings while ignoring undeniable proof. Failure to consider key evidence is a violation of due process (Gagnon v. Scarpelli, 411 U.S. 778 (1973))

8. Plaintiff has been silenced and ignored while proof of ongoing child abuse remains suppressed.

9. Defendant Michelle Ybarra's fraudulent statements directly influenced custody rulings, leading to unfair judicial bias against Plaintiff.

10. Plaintiff suffered financial hardship, legal prejudice, and irreparable harm to his parental rights due to these systemic violations.

### III. CAUSES OF ACTION

#### COUNT I – VIOLATION OF DUE PROCESS & EQUAL PROTECTION (42 U.S.C. § 1983)

11. Defendant Judge Lutz engaged in judicial misconduct, violating Plaintiff's constitutional rights under the Fourteenth Amendment by refusing to rule on motions necessary for a fair trial.

12. The court's refusal to rule obstructs justice and prevents Plaintiff from securing parental rights, causing irreparable harm.

#### COUNT II – FRAUD & PERJURY

13. Defendant Michelle Ybarra knowingly made false statements under oath, leading to fraudulent legal outcomes.

14. Defendant LADC knowingly facilitated fraud by providing legal aid to an ineligible individual, misusing public funds.

15. These fraudulent acts resulted in unlawful court decisions that denied Plaintiff access to his children.

**COUNT III – TITLE VI CIVIL RIGHTS VIOLATION (42 U.S.C. § 2000d)**

16. Defendant LADC violated Title VI by providing legal assistance to Defendant Michelle Ybarra while systematically denying Plaintiff, a Mexican-American father, access to similar legal aid.

17. Defendant's racial and gender bias directly impacted the judicial process, leading to an unfair legal battle.

**COUNT IV – WIRE FRAUD (18 U.S.C. § 1343)**

18. Defendant Michelle Ybarra electronically submitted fraudulent legal aid applications and financial statements to the court and LADC.

19. This constitutes wire fraud, as the misrepresentations were made through digital filings and court records.

**IV. REQUESTED RELIEF**

**WHEREFORE, Plaintiff respectfully requests that this Court:**

1. Issue an immediate injunction staying all Dakota County Family Court proceedings pending federal review.
2. Order an investigation into financial fraud, judicial bias, and civil rights violations committed by Defendants.
3. Grant Plaintiff full legal and physical custody of his children due to the ongoing civil rights violations and suppression of child abuse and perjury evidence.
4. Issue an injunction preventing Defendants from further interfering with Plaintiff's legal rights.

6. Grant any further relief this Court deems just and proper.

Dated: March 13, 2025

Respectfully submitted,

*Steve Ybarra*

Steve Salvador Ybarra

Pro Se Litigant

20470 Kensfield Trail

Lakeville, MN 55044

(612) 544-5700

Steve.Ybarra81@icloud.com